

1 **REESE RICHMAN LLP**

2 Michael R. Reese (Cal. State Bar. No. 206773)

3 Kim E. Richman

4 Belinda L. Williams

5 875 Avenue of the Americas, 18th Floor

6 New York, New York 10001

7 Telephone: (212) 643-0500

8 Facsimile: (212) 253-4272

9 michael@reeserichman.com

10 kim@reeserichman.com

11 belinda@reeserichman.com

12 *Counsel for Plaintiff and the Proposed Class*

13 **KIRKLAND & ELLIS LLP**

14 Jeffrey L. Willian

15 Robert B. Ellis

16 Bradley H. Weidenhammer

17 Nickolas Kacprowski (Cal. State Bar No. 242684)

18 300 North La Salle

19 Chicago, Illinois 60654

20 Telephone: (312) 862-2000

21 Facsimile: (312) 862-2200

22 **E-FILED - 2/2/10**

23 *Counsel for Defendant*

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 SAN JOSE DIVISION

27 WAYNE KOH, Individually And On Behalf Of
28 All Others Similarly Situated,

29 Case No. 09-cv-00927 (RMW)

30 Plaintiff,

31 ***STIPULATION AND []
32 ORDER EXTENDING DISCOVERY
33 CUT-OFF AND RELATED DATES***

34 vs.

35 SC Johnson & Son, Inc.,

36 Defendant.

1 Plaintiff Wayne Koh (“Plaintiff”) and defendant SC Johnson & Son, Inc. (“Defendant”)
2 (collectively the “Parties”) hereby stipulate to the following discovery schedule. The Parties also
3 hereby respectfully request that the Court order the stipulated schedule.

4 **STIPULATION**

5 WHEREAS, on July 10, 2009, the Court entered the following schedule (Dkt. 28):

6 Discovery cut-off: January 8, 2010
7 Disclosure of experts: February 8, 2010
8 Expert discovery cut-off: March 12, 2010
9 Pretrial Conference: May 13, 2010 at 2:00 p.m.
10 Jury Trial: June 7, 2010 at 1:30 p.m.

11 WHEREAS, though the Parties have been engaging in discovery they realize that they
12 need additional time to complete discovery than allowed by the current schedule; and

13 WHEREAS, the Parties estimate they need an extension of one hundred eighty (180)
14 days to complete discovery.

15 THE FOLLOWING SCHEDULE, UPON PERMISSION OF THE COURT, IS
16 AGREED TO BY THE PARTIES:

17 Discovery cut-off: July 8, 2010
18 Disclosure of experts: August 6, 2010
19 Expert discovery cut-off: September 10, 2010
20 Pretrial Conference: November 4, 2010 at 2:00 p.m.
21 Jury Trial: December 6, 2010 at 1:30 p.m.
22 Last Day to Hear Dispositive Motions: October 1, 2010 at 9:00 a.m.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 DATED: December 21, 2009

3 **REESE RICHMAN LLP**

4 *Michael R. Reese*
5 Michael R. Reese
6 875 Avenue of the Americas, 18th Floor
7 New York, New York 10001
8 Telephone: (212) 643-0500
9 Facsimile: (212) 253-4272

10 *Counsel for Plaintiff and the Proposed Class*

11 DATED: December 21, 2009

12 **KIRKLAND & ELLIS LLP**

13 */s/ Bradley H. Weidenhammer (with permission)*
14 Bradley H. Weidenhammer
15 300 North La Salle
16 Chicago, Illinois 60654
17 Telephone: (312) 862-2000
18 Facsimile: (312) 862-2200

19 *Counsel for Defendant SC Johnson & Son, Inc.*

20 **[] ORDER**

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22 DATED: 2/2/10

23 *Ronald M. Whyte*

24 Ronald M. Whyte
25 United States District Judge